

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

KISSEI PHARMACEUTICAL CO., LTD.,)	
WATSON LABORATORIES, INC. and)	
ACTAVIS, INC.,)	
)	
Plaintiffs,)	
)	C.A. No. 13-1092 (LPS)
v.)	
)	
SANDOZ INC.,)	
)	
Defendant.)	

STIPULATION TO STAY AND [PROPOSED] ORDER

WHEREAS, the parties to this action have been engaged in discussions to settle their disputes;

WHEREAS, the parties have stipulated to extensions of case deadlines in order to devote their attention and efforts to continued settlement negotiations, and the Court has approved and ordered such extensions (D.I. 77 & 78); and

WHEREAS, the parties would like to continue to focus their resources on settlement negotiations rather than on the expenses associated with continued litigation;

IT IS HEREBY STIPULATED by the parties, subject to the approval of the Court, that all deadlines in this action as set forth in the Court's Scheduling Order (D.I. 25) as modified by D.I. 77 and 78 are stayed from the date of this Order. If by 45 days from the entry of this Order a stipulation of dismissal has not been filed, the parties shall submit a joint status report to the Court setting forth (a) the status of the parties' settlement efforts and (b) their respective views as to whether continuing the stay would be productive. If the Court orders that the stay be lifted, the parties will submit a proposed Scheduling Order within 21 days of such order, or at such time as the Court may direct.

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May 19, 2015

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SO ORDERED this ____ day of May, 2015.

CHIEF, UNITED STATES DISTRICT JUDGE